**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE APACHE CORP. SECURITIES LITIGATION	Case No. 4:21-cv-00575
	District Judge George C. Hanks, Jr.
	Magistrate Judge Andrew M. Edison
	<u>CLASS ACTION</u>

**DECLARATION OF THOMAS R. AJAMIE IN SUPPORT OF LEAD
PLAINTIFFS' UNOPPOSED MOTION FOR AN ORDER PRELIMINARILY
APPROVING PROPOSED SETTLEMENT AND AUTHORIZING
<u>DISSEMINATION OF NOTICE TO THE SETTLEMENT CLASS</u>**

I, Thomas R. Ajamie, declare as follows pursuant to 28 U.S.C. § 1746:

1.   I am a member in good standing of the State Bar of Texas and am admitted to practice before this Court. I am Managing Partner of the law firm Ajamie LLP. I submit this Declaration in support of Lead Plaintiffs' Unopposed Motion for an Order Preliminarily Approving Proposed Settlement and Authorizing Dissemination of Notice to the Settlement Class.

2.   Attached hereto as Exhibit 1 is a true and correct copy of the Stipulation and Agreement of Settlement dated May 7, 2024 ("Stipulation"), and the following exhibits to the Stipulation:

        Exhibit A: [Proposed] Order Preliminarily Approving Settlement and Providing for Notice

        Exhibit A-1: Postcard Notice

Exhibit A-2:   Notice of: (I) Pendency of Class Action and Proposed Settlement; (II) Settlement Hearing; and (III) Motion for Attorneys' Fees and Litigation Expenses

Exhibit A-3:   Summary Notice of: (I) Pendency of Class Action and Proposed Settlement; (II) Settlement Hearing; and (III) Motion or Attorneys' Fees and Litigation Expenses

Exhibit A-4:   Proof of Claim and Release Form

Exhibit B: [Proposed] Final Judgment and Order of Dismissal

3.   Attached hereto as Exhibit 2 is a true and correct copy of the resume of A.B. Data, Ltd.'s Class Action Administration Company. In connection with their motion, Lead Plaintiffs have requested that the Court approve A.B. Data, Ltd.'s retention as the Claims Administrator for the Settlement.

4.   I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 8th day of May, 2024

                                                        s/ Thomas R. Ajamie
                                                        Thomas R. Ajamie

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